

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: RAILWAY INDUSTRY	)	Master Docket Misc. No. 18-798
EMPLOYEE NO-POACH ANTITRUST	)	
LITIGATION	)	MDL No. 2850
	)	
This Document Relates to:	)	
ALL ACTIONS	)	

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF  
PROPOSED CLASS ACTION SETTLEMENTS**

Plaintiffs respectfully move the Court for an order to: (1) finally approve the terms of the Settlements dated October 16, 2019 with the Knorr Defendants and February 24, 2020 with the Wabtec Defendants as fair, reasonable, and adequate; (2) grant final certification of a Settlement Class pursuant to Rules 23(a), (b)(3), and (e) of the Federal Rules of Civil Procedure; (3) finally approve the plan of allocation proposed by Plaintiffs; and (4) authorize the distribution of the Settlement Funds as specified in the Settlement Agreements, including for the purpose of paying out claims and, as discussed in Plaintiffs' Memorandum of Law In Support of Motion for Attorneys' Fees, Costs, and Service Awards (Dkt. 271), for disbursement of attorney's fees, costs, service awards, and the cost of settlement administration.

Defendants do not oppose this motion.

In further support of this Motion, Plaintiffs submit the accompanying memorandum of law; the Joint Declaration of Dean M. Harvey and Roberta D. Liebenberg, and attached exhibits; and the Declaration of Derek Smith, and attached exhibits.

Plaintiffs respectfully request that their Motion be granted.

Dated: July 17, 2020

Respectfully submitted,

/s/ Dean M. Harvey  
Dean M. Harvey (*pro hac vice*)  
Lin Y. Chan (*pro hac vice*)  
Yaman Salahi (*pro hac vice*)  
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111-3339  
Telephone: (415) 956-1000  
Facsimile: (415) 956-1008  
dharvey@lchb.com  
lchan@lchb.com  
ysalahi@lchb.com

*Co-Lead Class Counsel*

/s/ Kelly K. Iverson  
Kelly K. Iverson (307175)  
CARLSON LYNCH, LLP  
1133 Penn Avenue, 5th Floor  
Pittsburgh, PA 15222  
412-322-9243  
kiverson@carlsonlynch.com

*Liaison Counsel for the Settlement Class*

/s/ Roberta D. Liebenberg  
Roberta D. Liebenberg (*pro hac vice*)  
Gerard A. Dever (*pro hac vice*)  
Adam J. Pessin (*pro hac vice*)  
FINE, KAPLAN AND BLACK, R.P.C.  
One South Broad Street, Suite 2300  
Philadelphia, PA 19107  
Telephone: (215) 567-6565  
Facsimile: (215) 568-5872  
rliebenberg@finekaplan.com  
gdever@finekaplan.com  
apessin@finekaplan.com